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March 4, 2022

BY ECF

The Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Frontier Airlines v. AMCK Aviation, et al.*, Case No. 20-cv-09713-LLS

Dear Judge Stanton:

Pursuant to Section 3.B. of the Court's Individual Practices, Plaintiff Frontier Airlines, through this Letter Motion, requests that the Court seal Exhibits 1–3 to the Declaration of David G. Hosenpud filed in support of Frontier's Response to Defendants' Letter Motion to request a pre-motion conference regarding a protective order precluding the depositions of Messrs. Gerald Ma and Francis Lee ("Hosenpud Decl.") The parties conferred before filing this Letter Motion.

The documents attached as Exhibits 1–3 to the Hosenpud Decl. have been marked "Confidential" by Defendants pursuant to the Stipulated Protective Order Regarding Confidential Information and Documents, entered on January 4, 2022 (ECF No. 71), and are subject to paragraph 8.4. This paragraph requires the following in part: "If a non-designating party is filing a document that another party has designated as 'Confidential' or 'Highly Confidential – Attorneys' Eyes Only,' then the non-designating party shall file the document under seal."

Exhibits 1–3 reference non-public internal communications between Defendant AMCK and its director/shareholder representatives Messrs. Gerald Ma and Francis Lee. The substance of these communications is relevant to their involvement in the claims in this case and to AMCK's pending request for a pre-motion conference regarding the issuance of a protective order precluding the depositions of these individuals. These Exhibits also contain non-public internal communications between representatives of Frontier and AMCK further demonstrating the involvement of these individuals in the claims at issue in this case.

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For these reasons Frontier respectfully requests that Exhibits 1–3 be approved to be filed under seal.

Respectfully submitted,

LANE POWELL PC

s/David G. Hosenpud

David G. Hosenpud

cc: Counsel of Record (via ECF)

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